

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case *Burlingame v. Bin Laden, et al.*, 02-cv-7230)

STATE OF NEW YORK)
COUNTY OF NASSAU)

MATTHEW DOWDELL, hereby states under penalty of perjury that:

1. I am a resident citizen of the state of New York, born on [REDACTED] 1974, and I am the surviving stepson of Brian Magee who was killed in the September 11th attacks.

2. My mother, Valerie Magee, was married to Brian Magee on August 7, 1983.

3. My mother, two brothers and I lived with my stepfather from 1983, when I was 8 years old, until I moved out at the age of 25.

4. My mother and biological father divorced when I was 3 years old. After they separated, I did not have much of a relationship with him and eventually stopped all communication when I was about 14 years old. He provided us with little or no financial support.

5. Brian Magee was my father in all respects other than biology. From the moment Brian moved in he immediately took on the role as father to me and my brothers. He provided me with financial and emotional support, teaching me, guiding me and providing all the care, companionship and nurturing that a father would give his son.

6. My stepfather did the things that a natural father would do, including having a catch outside on the lawn, rooting for me from the sidelines of my games, and he was always available

to help me with my schoolwork. He was the person I turned to for help, just as any other son would turn to his father.

7. When I needed Brian he was there – he was a man’s man, but he was also kind and compassionate and would be there to talk to when I needed him. I respected Brian’s work ethic and would always look to him for guidance when I struggled with something at work. He instilled in me a determination to work to my full potential just as he did. Brian was level-headed and calm, traits that I try to emulate now that I am a father and have my own career.

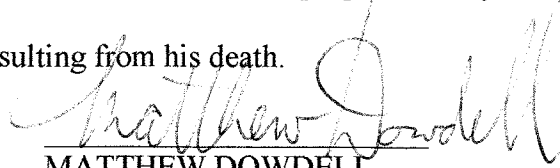
8. We always spent holidays as a family. Christmas Eve was a huge event at Brian’s brother’s house and the Magees followed Brian’s lead and always treated us as if we were his biological children. His siblings immediately welcomed us as family, they were our aunts, uncles and cousins. Since my mother and Brian married we were always included in his family’s celebrations and have continued to be included since his passing. Now, we are even closer with the Magee side of the family than we are with my mother’s blood relatives.

9. Brian paid for me to attend high school at Holy Cross and also helped me pay my college tuition. I remember one semester I was short on my tuition, so I called home and the following morning Brian was there with a check to cover the balance. He was always available when I needed him and was there when things were tough.

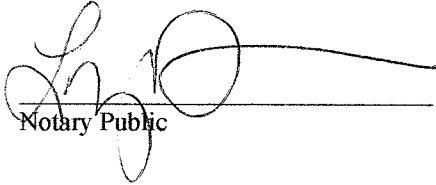
10. Brian shared his love for motorcycles and cars with me and my brothers. He also taught me how to drive and helped me shop for my first car. I always knew I could count on Brian, to help fix a flat or teach me how to change the oil on my car, just as any son would with his father.

11. Now, a stepfather myself, I realize how blessed my brothers and I were to have had Brian as our stepfather. He was brave and courageous to marry a woman with three young children, but he was our dad and he loved us as his own.

12. I have been deeply affected by my stepfather's death and I respectfully request that the Court deem me the "functional equivalent" of Brian Magee's son for purposes of my claim for solatium damages against the Republic of Iran resulting from his death.


MATTHEW DOWDELL

Sworn to before me this 19th of
December 2019


Notary Public

LIZAIDA DOWDELL
NOTARY PUBLIC, State of New York
No. 01D06386105
Qualified in Queens County
Commission Exp. January 22, 2023